

REMARKS

Claims 1-41 and 45-52 are pending in this application with claims 1, 12, 16, 22, 30, 34, 38, 45, 47, 48 and 49 being independent. Claims 42-44 have been cancelled herein without prejudice or disclaimer. Claim 16 has been amended to recite the invention further.

Entry of this amendment is proper under 37 C.F.R. § 1.116 as the amendments: (a) place the application in condition for allowance for the reasons discussed herein; (b) do not raise any new issues that would require further consideration and/or search as the amendments merely amplify issues discussed throughout the prosecution; (c) do not present any additional claims without canceling a corresponding number of claims; and (d) place the application in better form for appeal, should an appeal be necessary. Entry of the Amendment is respectfully requested.

Claim Rejections – 35 USC § 101

Claims 42-44 were rejected under 35 U.S.C. § 101.

Claims 42-44 have been cancelled herein without prejudice or disclaimer. Therefore, the rejection of claims 42-44 under 35 U.S.C. § 101 is rendered moot.

Claim Rejections – 35 USC § 103

Claims 1, 2, 7-9, 12-19, 21-23, 30, 31, 33-42, 44 and 45-52 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Eldridge et al. (U.S. Patent No. 6,515,988) in view of Neukermans et al. (U.S. Patent No. 6,229,139). Claims 42-44 have been cancelled herein. Applicant respectfully traverses this rejection of the remaining claims for at least the following reasons.

Eldridge et al. discloses a portable device that receives, transmits, and processes tokens. (see field of the invention in col. 1 of Eldridge et al.) Tokens are a reference to a document or to a document service (see col. 2, lines 1-4 in Eldridge et al.). The tokens include all of the following information: the operation that is to be performed, the address of the document or the address of the system providing the document service, a parameter defining a property of a document or a service, a visible name, and a security parameter (see col. 2, lines 18-46 in Eldridge et al.). The tokens in Eldridge et al. are used in a portable device so that services can be performed on documents by transmitting tokens (including document identifiers) instead of the documents themselves. The tokens are transmitted to

another device (for example a network printer) which can check security and various other parameters and modify its default operations in response to the users input (see col. 1, lines 64-67 in Eldridge et al.). The tokens which include security information are presented to secure document servers which verify signatures on tokens and examines the specified conditions associated with the token (see col. 3, lines 11-19 in Eldridge et al.).

As conceded in the Office Action, Eldridge et al. does not disclose, teach or suggest “providing the document and capturing the information from the document, wherein the information comprises actual data from the document,” as required by claim 1.

The Examiner contends that Neukermans et al. discloses a handheld device with attached scanner used to capture information from the document, wherein the information comprises actual data from the document. The Examiner contends it would have been obvious to one of ordinary skill in the art to modify Eldridge et al. to scan a document and generate digital data for comparison identification as taught by Neukermans et al. Applicant respectfully disagrees.

Neukermans et al. does not cure the deficiencies noted above in Eldridge et al. Neukermans et al. discloses a handheld scanner. In Neukermans et al., the scanner may be externally coupled to a PDA or may be fully integrated within the PDA. The PDA can be used for storing scanned document images for immediately sorting and classifying the images and for later retrieval of the images. The scanned document images may later be downloaded to a desktop computer for additional data processing such as sorting, parsing of the data, OCR, ICR, and archival storage (see col. 3, lines 50-59 in Neukermans et al.).

There is no suggestion in either Eldridge et al. or Neukermans et al. or in the knowledge generally available to one of ordinary skill in the art to modify Eldridge et al. to scan a document and generate digital data which can be used for identification of the document.

“In determining the propriety of the patent Office case for obviousness in the first instance, it is necessary to ascertain whether or not the reference teachings would appear to be sufficient for one of ordinary skill in the art in the relevant art having the reference before him to make the proposed substitution, combination, or other modification.” *In re Linter*, 458 F.2d 1013, 1016, 173 USPQ 560, 562 (CCPA 1972).

In response, to the arguments filed October 11, 2005, the Examiner contends that the combined teachings discloses the additional feature of adding “document data” to the token

concept (emphasis added). The Examiner contends that in this configuration, “document data” is utilized as an additional parameter within the document identifier (i.e., token).

First of all, Neukermans et al. does not disclose, teach or even suggest sending the scanned document data using the PDA to a data processing apparatus through a communications path for identification of the document. The scanned document data in Neukermans et al. is merely parsed, stored and archived. The document data in Neukermans et al. is not sent through a communication path for identification of a document. Therefore, one of ordinary skill in the art would not have been motivated to combine the teachings of Neukermans et al. and Eldridge et al. to “add” the scanned document data of Neukermans et al. to the token of Eldridge et al.

Furthermore, Eldridge et al. merely stores and transmits tokens which are document identifiers such as URLs as well as information necessary to access documents (actual document data) stored in a repository at a site on the web. There is no suggestion in Eldridge et al. to replace the tokens with actual document data and there is no suggestion in Eldridge et al. to add actual document data to the tokens, as the Examiner suggested. In fact, Eldridge et al. clearly states that “documents are effectively distributed between devices by transmission of document URLs, rather than the lengthy document itself.” (emphasis added), (see col. 1, lines 35-37 in Eldridge et al.). Furthermore, Eldridge et al. merely transmits tokens that contain service or document parameters. For example, Eldridge et al. states that “The general token 30 includes a further component designated Service Parameters 38. This component itself has several components 382-389 which serve to further specify the service request. The Service Parameters 38 includes Service Name 382, which identifies how a service is identified to the user as a visible name in the user interface of the PDA 2. This may be simply a familiar name, e.g. "Print" or "Scan" or "Fax", a graphic icon, or can be more complex, e.g. a type-in form to be filled in by the user.” (see col. 7, lines 25-35 in Eldridge et al.). Consequently, Eldridge teaches away from sending actual document data through a communication path.

Furthermore, even if actual document data was added to the token in Eldridge, there is no suggestion in either Eldridge or Neukermans that such data would be used to identify the document. The token described in Eldridge contains information to identify the document. Absolutely no suggestion exists in either Eldridge or Neukermans to use actual document data captured from the document to replace the identifying data taught in Eldridge. Therefore, contrary to Examiner’s contention, one ordinary skill in the art would not have been

motivated to modify Eldridge et al. to scan a document and generate digital data which can be used for comparison identification.

Moreover, it would not have been obvious to combine Eldridge et al. and Neukermans et al. The modification of Eldridge as proposed by the Patent Office would destroy the apparatus of Eldridge et al. for its intended purpose. Hence, such a modification cannot be obvious.

“If proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification.” *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984).

Indeed, Eldridge et al. does not store and transmit lengthy data such as documents but merely stores and transmits tokens which are document identifiers, such as URLs, that are used for accessing documents stored in an electronic repository. Furthermore, the tokens in Eldridge et al. include security information which is presented to secure document servers for verification of signatures on the tokens and for examining specified conditions associated with the tokens.

Therefore, even if one would have modified Eldridge et al. with Neukermans et al. and replaced the tokens in Eldridge et al. with the scanned documents in Neukermans et al. or added the scanned documents to the tokens, which Applicant does not concede, replacing the tokens which contain security information by the scanned documents or adding the scanned documents to the tokens would defeat the purpose of Eldridge et al.’s device as the device in Eldridge et al. transmits tokens to access documents stored in a repository or to check and/or modify various parameters of another device (e.g., a printer). Replacing the tokens with the scanned document data or adding the scanned document data to the tokens in Eldridge et al. would simply allow the portable device in Eldridge et al. to transmit the document data to the other device (e.g., a printer) and thus destroy the purpose of Eldridge et al. which is to transmit tokens (documents identifiers) instead of the documents themselves.

Furthermore, the entire purpose of the tokens in Eldridge et al. is to avoid storing document data. Indeed, Eldridge et al. clearly states that “documents are effectively distributed between devices by transmission of document URLs, rather than the lengthy document itself.” (see col. 1, lines 35-37 in Eldridge et al.). To replace data in the token with actual document data or add actual document data to the token would defeat Eldridge’s intended purpose of transmitting tokens in place of actual documents. Hence, this would not have been obvious.

Consequently, neither Eldridge et al. nor Neukermans et al., alone or in combination disclose, teach or suggest the subject matter recited in claim 1.

With respect to claim 12, as conceded in the Office Action, Eldridge et al. does not disclose, teach or suggest “receiving from a handheld device, document data associated with one of the reference documents, wherein the document data comprises actual data from the document,” as recited in claim 12.

Furthermore, contrary to Examiner’s contention, Eldridge et al. does not disclose, teach or suggest “comparing the scanning data with the reference data,” as recited in claim 12. As stated above, Eldridge et al. does not provide scanned data much less compare the scanned data with a reference data. In col. 2, lines 26-28, Eldridge et al. merely states that “[t]he token contains the information necessary to find the document or service. The address could consist of the network address of a server and the file path name of a document.”

In addition, contrary to Examiner’s contention, Eldridge et al. does not disclose, teach or suggest “selecting, when the scanning data matches at least a portion of the reference data of one of the reference documents, the one reference document as the identified document,” as recited in claim 12.

The Examiner contends that Neukermans et al. discloses a handheld device with attached scanner used to capture information from the document, wherein the information comprises actual data from the document. The Examiner contends it would have been obvious to one of ordinary skill in the art to modify Eldridge et al. to scan a document and generate digital data for comparison identification as taught by Neukermans et al. Applicant respectfully disagrees.

Neukermans et al. does not cure the deficiencies noted above in Eldridge et al.

Moreover, there is no suggestion in either Eldridge et al. or Neukermans et al. to modify Eldridge et al. to scan a document and generate digital data which can be used for comparison identification. Clearly, Neukermans et al. does not disclose, teach or even suggest comparing the scanned document data “using the PDA” with a reference data. As stated above, the scanned document data in Neukermans et al. is merely parsed, stored and archived.

Furthermore, as stated above, there is no suggestion or motivation to replace the tokens in Eldridge et al. with actual document data, or to add actual document data to the tokens in Eldridge et al. Therefore, contrary to Examiner’s contention, one ordinary skill in

the art would not have been motivated to modify Eldridge et al. to scan a document and generate digital data which can be used for comparison identification. Consequently, neither Eldridge et al. nor Neukermans et al., alone or in combination disclose, teach or suggest the subject matter recited in claim 12.

With respect to claim 16, for at least the reasons provided above, Eldridge et al. does not disclose, teach or suggest “extracting at least a portion of the captured information as scanning data,” as recited in claim 16. In addition, Eldridge et al. does not disclose, teach or suggest “retrieving the scanning data from the memory,...comparing the scanning data with the reference data,” as recited in claim 16. Moreover, Eldridge et al. does not disclose, teach or suggest “sending, using the address information, the selected document to the receiving address of the recipient,” as recited in claim 16. In addition, for at least the reasons provided above, Eldridge et al. does not disclose, teach or suggest “selecting, when the scanning data matches at least a portion of the reference data associated with one of the reference documents, the one reference document as the identified document,” as recited in claim 16.

Neukermans et al. fails to cure the deficiencies noted above in Eldridge et al. Neukermans et al. does not disclose, teach or suggest the subject matter recited in claim 16. In addition for at least the reasons presented above with respect to claims 1 and 12, there is no suggestion or motivation to combine Eldridge et al. and Neukermans et al.

Consequently, neither Eldridge et al. nor Neukermans et al., alone or in combination disclose, teach or suggest the subject matter recited in claim 16.

With respect to claim 22, for at least the reasons provide above, Eldridge et al. does not disclose, teach or suggest “storing the captured information in the memory of the handheld device,” as recited in claim 22. Eldridge et al. does not disclose, teach or suggest “sending the captured information and the address information from the handheld device to the data processing apparatus via the communications path,” as recited in claim 22. Eldridge et al. does not disclose, teach or suggest “receiving, by the data processing apparatus, the captured information and the address information from the handheld device,” as recited in claim 22. Eldridge et al. does not disclose, teach or suggest “extracting at least a portion of the captured information as scanning data,” as recited in claim 22. Eldridge et al. does not disclose, teach or suggest “providing a plurality of reference documents, each reference document having reference data stored in a reference memory,” as recited in claim 22.

Eldridge et al. does not disclose, teach or suggest “retrieving the reference data from the reference memory,” as recited in claim 22. Eldridge et al. does not disclose, teach or suggest “comparing the scanning data with the reference data,” as recited in claim 22. Eldridge et al. does not disclose, teach or suggest “selecting, when the scanning data matches at least a portion of the reference data of one of the reference documents, the one reference document as the identified document,” as recited in claim 22. Furthermore, as conceded in Office Action, Eldridge et al. does not disclose teach or suggest “capturing the information from the document using the handheld device, wherein the information comprises actual data from the document,” as recited in claim 22.

Neukermans et al. does not cure the deficiencies noted above in Eldridge et al. Neukermans et al. merely discloses a handheld scanner. In addition, for at least the reasons presented above with respect to claim 1 and claim 12, there is no suggestion or motivation to combine Eldridge et al. and Neukermans et al.

Consequently, neither Eldridge et al. nor Neukermans et al., alone or in combination disclose, teach or suggest the subject matter recited in claim 22.

With respect to claim 30, contrary to Examiner’s contention Eldridge et al. does not disclose, teach or suggest “a processor coupled to the memory and coupled to : (i) access the reference data in a storage medium, and (ii) receive the information from the handheld device, wherein the information comprises actual data from a document, the processor capable of executing the instructions in the memory, execution of the instructions causing a plurality of steps to be performed including: extracting at least a portion of the information received from the handheld device as scanning data, comparing the scanning data with the reference data, and selecting, when the scanning data matches at least a portion of the reference data of one of the reference documents, the one reference document as the identified document,” as recited in claim 30.

As stated above, Eldridge et al. does not extract at least a portion of the received data as scanning data much less compare the scanned data with a reference data. Moreover, Eldridge et al. does not select the one reference document as the identified document when the scanning data matches at least a portion of the reference data of one of the reference documents.

Neukermans et al. fails to cure the deficiencies noted above in Eldridge et al. Furthermore, as noted above, there is no suggestion or motivation to combine Eldridge et al. and Neukermans et al.

Consequently, neither Eldridge et al. nor Neukermans et al., alone or in combination disclose, teach or suggest the subject matter recited in claim 30.

With respect to claim 34, contrary to Examiner's contention, Eldridge et al. does not disclose, teach or suggest "a handheld device having a memory and capable of: capturing the information from the document, wherein the information comprises actual data from the document, storing the captured information in the memory, storing, in the memory, address information identifying a receiving address for the recipient, establishing a communications path with the data processing apparatus, and sending the captured information and the address information from the handheld device to the data processing apparatus via the communications path," as recited in claim 34. As stated above, Eldridge et al. does not capture information of a document.

Neukermans et al. fails to overcome the deficiencies noted above in Eldridge et al. In addition, for at least the reasons presented above with respect to claim 1 and claim 12, there is no suggestion or motivation to combine Eldridge et al. and Neukermans et al.

Consequently, neither Eldridge et al. nor Neukermans et al., alone or in combination, disclose, teach or suggest the subject matter recited in claim 34.

With respect to claims 38, as conceded in the Office Action Eldridge et al. does not disclose "extracting at least a portion of the information received from the handheld device as scanning data, wherein the information comprises actual data from a document."

Furthermore, contrary to Examiner's contention, Eldridge et al. does not disclose, teach or suggest "extracting at least a portion of the information received from the handheld device as address information identifying a receiving address for the recipient," as recited in claim 38. Eldridge et al. does not disclose, teach or suggest "comparing the scanning data with the reference data," much less "selecting, when the scanning data matches at least a portion of the reference data of one of the reference documents, the one reference document as the identified document," as recited in claim 38. Moreover, contrary to Examiner's contention, Eldridge et al. does not disclose, teach or suggestion "sending, using the address



information, the selected document to the receiving address of the recipient,” as recited in claim 38.

Neukermans et al. fails to cure the deficiencies noted above in Eldridge et al. In addition, for at least the reasons presented above with respect to claim 1 and claim 12, there is no suggestion or motivation to combine Eldridge et al. and Neukermans et al.

Therefore, for the above additional reasons, neither Eldridge et al. nor Neukermans et al., alone or in combination, disclose, teach or suggest the subject matter recited in claim 38.

With respect to claim 45, as conceded in the Office Action, Eldridge et al. does not disclose “capturing information from the item, wherein the information comprises actual data from the item,” as recited in claim 45.

Furthermore, contrary to Examiner’s contention, Eldridge et al. does not disclose, teach or suggest “storing the captured information in the memory of the handheld device as data,” as recited in claim 45. Eldridge et al. does not disclose, teach or suggest “retrieving the captured information from the memory of the handheld device,” as recited in claim 45. Eldridge et al. does not disclose, teach or suggest “sending the retrieved data from the handheld device to the data processing apparatus through the communications path for identification of the item,” as recited in claim 45.

Neukermans et al. fails to cure the deficiencies noted above in Eldridge et al. In addition, for at least the reasons presented above with respect to claim 1 and claim 12, there is no suggestion or motivation to combine Eldridge et al. and Neukermans et al.

Therefore, for these additional reasons, Applicant submits that neither Eldridge et al. nor Neukermans et al, alone or in combination, disclose, teach or suggest the subject matter recited in claim 45.

With respect to claims 47, 48 and 49, as conceded in the Office Action, Eldridge et al. does not disclose “receiving, from a handheld device in communication with the data processing apparatus, information captured from an item by the handheld device, wherein the information comprises actual data from the item, and address information identifying a receiving address for the recipient,” as recited in claim 47, Eldridge et al. does not disclose “receiving, from a handheld device in communication with the data processing apparatus, information captured from a document by the handheld device, wherein the information comprises actual data from the document,” as recited in claims 48 and 49.

Moreover, contrary to Examiner's contention, Eldridge et al. does not disclose, teach or suggest "extracting at least a portion of the captured information as scanning data; comparing the scanning data with the reference data; selecting, when the scanning data matches at least a portion of the reference data associated with one of the reference items, the one reference item as the identified item; and sending, using the address information, the identified item to the receiving address of the recipient," as recited in claim 47. Furthermore, Eldridge et al. does not disclose, teach or suggest "providing a plurality of reference documents, each reference document having associated reference data stored in a memory; extracting at least a portion of the captured information as scanning data; comparing the scanning data with the reference data; and selecting, when the scanning data matches at least a portion of the reference data associated with one of the reference documents, the one reference document as the identified document," as recited in claim 48. Moreover, Eldridge et al. does not disclose, teach or suggest "providing a plurality of reference items, each reference item having associated reference data stored in a memory; receiving, from a handheld device in communication with the data processing apparatus, information captured from an item by the handheld device, wherein the information comprises actual data from the item; extracting at least a portion of the captured information as scanning data; comparing the scanning data with the reference data; and selecting, when the scanning data matches at least a portion of the reference data associated with one of the reference items, the one reference item as the identified item," as recited in claim 49.

Neukermans et al. fails to cure the above deficiencies noted in Eldridge et al. In addition, for at least the reasons presented above with respect to claim 1 and claim 12, there is no suggestion or motivation to combine Eldridge et al. and Neukermans et al.

Consequently, for these additional reasons, Applicant submits that neither Eldridge et al. nor Neukermans et al., alone or in combination, disclose, teach or suggest the subject matter recited in claims 47-49.

Therefore, Applicant respectfully submits that claims 1, 12, 16, 22, 30, 34, 38, 45, 47, 48 and 49, and claims 2 and 7-9, 13-15, 17-19, 21, 23, 31, 33, 35-37, 39-41, 46 and 50-52 which depend from one of claims 1, 12, 16, 22, 30, 34, 38, 45, 47, 48 and 49, are patentable. Thus applicant respectfully requests that the rejection of claims 1, 2, 7-9, 12-19, 21-23, 30, 31, 33-41 and 45-52 under 35 U.S.C. § 103(a) over the combination of Eldridge et al. and Neukermans et al. be withdrawn.

Claims 3-6 and 24-27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Eldridge et al. and Neukermans et al. and further in view of Hayakawa (U.S. Patent No. 6, 765,559). Applicant respectfully traverses this rejection for at least the following reasons.

Claims 3-6 depend, directly or indirectly, from claim 1 and claims 24-27 depend, directly or indirectly, from claim 22. For at least the reasons provided above with respect to claims 1 and 22, Applicant respectfully submits that claims 3-6 and 24-27 are patentable over the combination of Eldridge et al. and Neukermans et al.

Hayakawa fails to cure the deficiencies noted above in the combination of Eldridge et al. and Neukermans et al. Hayakawa merely discloses a page information display method and device for displaying electronic information in a unit of page which includes a page turning operation. Hayakawa does not disclose, teach or suggest, *inter-alia*, “providing the document; capturing the information from the document, wherein the information comprises actual data from the document; storing the captured information in the memory of the handheld device as document data; establishing a communications path between the handheld device and the data processing apparatus; retrieving the document data from the memory of the handheld device; and sending the retrieved document data from the handheld device to the data processing apparatus through the communications path for identification of the document,” as recited in claim 1.

Furthermore, Hayakawa does not disclose, teach or suggest, *inter-alia*, “capturing the information from the document using the handheld device, wherein the information comprises actual data from the document; storing the captured information in the memory of the handheld device; providing, to the handheld device, address information identifying a receiving address for the recipient; storing, in the memory of the handheld device, the address information; establishing a communications path between the handheld device and the data processing apparatus; sending the captured information and the address information from the handheld device to the data processing apparatus via the communications path; receiving, by the data processing apparatus, the captured information and the address information from the handheld device; extracting at least a portion of the captured information as scanning data; providing a plurality of reference documents, each reference document having reference data stored in a reference memory; retrieving the reference data from the reference memory; comparing the scanning data with the reference data; selecting, when the scanning data matches at least a portion of the reference data of one of the reference documents, the one

reference document as the identified document; and sending, using the address information, the selected document to the receiving address of the recipient,” as recited in claim 22. Consequently, for at least the above reasons, none of Eldridge et al., Neukermans et al. and Hayakawa et al., alone or in combination, disclose, teach or suggest the subject matter recited in claims 3-6 and 24-27.

Therefore, Applicant respectfully submits that claims 3-6 and 24-27 are patentable and respectfully requests that the rejection of claims 3-6 and 24-27 under § 103(a) over the combination of Eldridge et al., Neukermans et al. and Hayakawa be withdrawn.

Claims 10, 20, 28, 32 and 43 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Eldridge et al. and Neukermans et al. and further in view of Browning (U.S. Patent No. 6,707,781). Claim 43 has been cancelled herein. Applicant respectfully traverses this rejection for the remaining claims for at least the following reasons.

Claims 10, 20, 28 and 32 depend, directly or indirectly, from one of claim 1, 16, 22 and 30. For at least the reasons provided above with respect to claims 1, 16, 22 and 30, Applicant respectfully submits that claims 10, 20, 28 and 32 are patentable over the combination of Eldridge et al. and Neukermans et al.

Browning fails to cure the deficiencies noted above in the combination of Eldridge et al. and Neukermans et al. Browning merely discloses a handheld device for scanning a line information including internet email addresses, internet protocol addresses, internet URLs, DNS addresses and bar codes etc...Browning does not disclose, teach or suggest the subject matter recited in any one of claims 1, 16, 22 and 30. Consequently, none of Eldridge et al., Neukermans et al. and Browning, alone or in combination, disclose, teach or suggest the subject matter claimed in claims 10, 20, 28 and 32.

Therefore, Applicant respectfully submits that claims 10, 20, 28 and 32 are patentable and respectfully requests that the rejection of claims 10, 20, 28 and 32 under § 103(a) over the combination of Eldridge et al., Neukermans et al. and Browning be withdrawn.

Claims 11 and 29 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Eldridge et al. and Neukermans et al. and further in view of Hochendoner (U.S. Patent No. 6,771,568). Applicant respectfully traverses this rejection for at least the following reasons.

Claims 11 and 29 depend, directly, from claim 1 and claim 22, respectively. For at least the reasons provided above with respect to claims 1 and 22, Applicant respectfully submits that claims 11 and 29 are patentable over the combination of Eldridge et al. and Neukermans et al.

Hochendoner fails to cure the deficiencies noted above in the combination of Eldridge et al. and Neukermans et al. Hochendoner merely discloses a digital audio recorder having a compact disk and a memory containing a database relating to specific CD's such as album name, artist name etc...Hochendoner does not disclose, teach or suggest the subject matter recited in any one of claims 1 and 22. Consequently, none of Eldridge et al., Neukermans et al. and Hochendoner, alone or in combination, disclose, teach or suggest the subject matter claimed in claims 11 and 29.

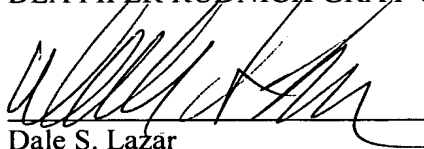
Therefore, Applicant respectfully submits that claims 11 and 29 are patentable and respectfully requests that the rejection of claims 11 and 29 under § 103(a) over the combination of Eldridge et al., Neukermans et al. and Hochendoner be withdrawn.

#### CONCLUSION

In view of the foregoing, Applicant submits that this application is now in condition for allowance. An early and favorable indication of same is kindly requested. If any point remains at issue, however, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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